EXHIBIT 10

1   UNITED STATES DISTRICT COURT

2   FOR THE NORTHERN DISTRICT OF CALIFORNIA

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4   _____

5   CISCO SYSTEMS, INC.,   )

6   Plaintiff,   )

7   vs.   )Civil Action No.:

8   ARISTA NETWORKS, INC.,   )5:14-cv-05344-BLF(PSG)

9   Defendant.   )

10   _____)

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12   CONFIDENTIAL

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14   VIDEOTAPED DEPOSITION OF DEVADAS PATIL

15   Palo Alto, California

16   Sunday, February 21, 2016

17   Volume 1

18

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21   Reported by:

22   RACHEL FERRIER, CSR No. 6948

23   Job No. 2223126

24

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1	Do you see that?	01:56PM
2	A Yes.	01:56PM
3	Q What are "MIB tables"?	01:56PM
4	A So "MIB tables" are the -- the storage that make	01:56PM
5	SNMP queries possible, so MIBs are -- essentially	01:56PM
6	support information for SNMP.	01:56PM
7	Q And so are -- are the tables different from the	01:56PM
8	MIBs themselves?	01:56PM
9	A MIBs -- MIB tables are like the blueprint for the	01:56PM
10	actual tables -- I'm sorry, MIB tables are the blueprint	01:56PM
11	for the actual MIB data, if that makes sense.	01:56PM
12	Q MIB tables -- I'm sorry, can you explain that?	01:56PM
13	So let me -- let me ask the question again.	01:57PM
14	How -- strike that.	01:57PM
15	Are tables different from the MIBs themselves?	01:57PM
16	A In -- in the -- and I have not used this language	01:57PM
17	for a long time, and I've not used SNMP in a long time,	01:57PM
18	but my understanding is that the language of SNMP -- in	01:57PM
19	the language of SNMP, the MIB table is like a blueprint.	01:57PM
20	It's called the data that is housed in the MIB.	01:57PM
21	Q And the -- the term "MIB table," that -- is that	01:57PM
22	a term that is familiar to those in networking industry?	01:57PM
23	MR. CANNON: Objection; vague, lacks foundation,	01:57PM
24	calls for improper opinion testimony.	01:57PM
25	THE WITNESS: Yes.	01:57PM

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1	BY MR. WONG:	01:57PM
2	Q And you certainly know what a "MIB table" is if	01:57PM
3	you heard that term used; correct?	01:58PM
4	A Yes.	01:58PM
5	Q And you would understand what a "MIB table" is	01:58PM
6	based upon your experience working in the networking	01:58PM
7	industry; correct?	01:58PM
8	A Yes.	01:58PM
9	Q What was the process at Cisco for selecting a	01:58PM
10	command syntax? And we can talk specifically about the	01:58PM
11	commands listed on Exhibit 316 --	01:58PM
12	A Mm-hmm.	01:58PM
13	Q -- but -- so let me just rephrase the question,	01:58PM
14	actually.	01:58PM
15	For the commands listed in Exhibit 316, what was	01:58PM
16	the process at Cisco for selecting the command syntax?	01:58PM
17	MR. CANNON: Objection; vague, lacks foundation,	01:58PM
18	calls for speculation.	01:58PM
19	THE WITNESS: Well, there is -- the -- the	01:58PM
20	product owner, which is me, lead developer for the	01:58PM
21	product, comes up with initial proposal, and it is,	01:58PM
22	essentially, reviewed by a group of people that are	01:58PM
23	highly experienced for -- for usability and	01:59PM
24	extensibility, and so on, so there are certain criteria	01:59PM
25	that they look -- look at, including usability,	01:59PM

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 1    extensibility, aesthetics, etc.                      01:59PM

 2    BY MR. WONG:                                         01:59PM

 3       Q    And have you heard of the term "parser-police"?  01:59PM

 4       A    Yes.                                         01:59PM

 5       Q    Is the group of people that you are referring to  01:59PM

 6    in your prior answer -- is that the parser-police?   01:59PM

 7       A    That's the -- that's the main one, yes.      01:59PM

 8       Q    Are there other groups of people at Cisco that  01:59PM

 9    review proposed command syntaxes?                    01:59PM

10       A    Yes, there are.                              01:59PM

11       Q    Who are the other groups of people besides the  01:59PM

12    parser-police that review proposed command syntaxes?  02:00PM

13       A    That --                                      02:00PM

14          MR. CANNON:  Objection; vague, calls for       02:00PM

15    speculation.                                         02:00PM

16          THE WITNESS:  That would be the functional     02:00PM

17    specification and design specification reviewers.    02:00PM

18    BY MR. WONG:                                         02:00PM

19       Q    Are those the same reviewers that are listed on  02:00PM

20    the -- the cover page of the functional specification  02:00PM

21    that we were looking at earlier?                     02:00PM

22       A    Yes.                                         02:00PM

23       Q    Okay.  And were those individuals listed on the  02:00PM

24    cover page of Exhibit 317 involved in reviewing the  02:00PM

25    command syntaxes for the commands listed on Exhibit 316?  02:00PM
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1	A Yes.	02:00PM
2	Q How were those individuals listed on the cover	02:00PM
3	page of Exhibit 317 involved in coming up with the	02:00PM
4	syntaxes for the commands listed on Exhibit 316?	02:01PM
5	A Well, they -- they -- they're also quite	02:01PM
6	experienced in developing these -- these -- these types	02:01PM
7	of commands, and they give an initial opinion on whether	02:01PM
8	to take it to the next level and get it -- get it	02:01PM
9	reviewed by parser-police, so there were initial --	02:01PM
10	initial -- there would basically be an initial	02:01PM
11	verification of the usability and extensibility criteria	02:01PM
12	that we talked about earlier.	02:01PM
13	Q Looking at the cover page of Exhibit 317 --	02:01PM
14	A Yes.	02:02PM
15	Q -- was Mr. Deepak Kumar involved in creating the	02:02PM
16	command syntaxes for the commands listed on Exhibit 316?	02:02PM
17	MR. CANNON: Objection; vague.	02:02PM
18	THE WITNESS: I mean, in -- in all as a reviewer,	02:02PM
19	yes, but I came up with the initial proposal.	02:02PM
20	BY MR. WONG:	02:02PM
21	Q Is that true for each of the individuals listed	02:02PM
22	on the cover of Exhibit 317?	02:02PM
23	MR. CANNON: Objection; vague.	02:02PM
24	THE WITNESS: For Exhibit 317, these --	02:02PM
25	these were -- these were engineers in my immediate	02:02PM

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1	Q What do you mean by that?	02:36PM
2	A What I mean by that is whatever syntax we are	02:36PM
3	using at the global level, let's keep it similar at the	02:37PM
4	interface level so that we have -- we have consistency	02:37PM
5	and, naturally, the skills transfer associated with	02:37PM
6	consistency.	02:37PM
7	Q So similar to what we were talking about with	02:37PM
8	respect to Exhibit 320, the prior e-mail that we were	02:37PM
9	talking about?	02:37PM
10	A Yes.	02:37PM
11	Q Further on in this paragraph on Exhibit 321,	02:37PM
12	after "c," you say, "there aren't many org-specific	02:37PM
13	commands belonging to MED, IEEE, IETF to warrant a	02:37PM
14	strict hierarchy."	02:37PM
15	Do you see that?	02:37PM
16	A Yes.	02:37PM
17	Q What do you mean by a "strict hierarchy" there?	02:37PM
18	A I -- I -- I think the contention was between	02:37PM
19	creating a middle order node and listing all the options	02:38PM
20	below or to create whole -- whole commands for each	02:38PM
21	option, and I was -- I don't recall exactly what	02:38PM
22	position I took, but I -- I was always inclined to	02:38PM
23	support the usability story and the consistency story,	02:38PM
24	and there aren't many -- many aren't specific commands	02:38PM
25	belonging to MED, IEEE, and IETF to warrant strict	02:38PM

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1	hierarchy.	02:38PM
2	If you want a strict hierarchy, you would have an	02:38PM
3	intermediate node and list all the specific options, but	02:38PM
4	since there aren't any, I might have taken this	02:38PM
5	position; although, it's -- it's -- it may seem a little	02:38PM
6	bit weak for in terms of future-proofing things.	02:38PM
7	So there's a -- there's a -- there's a balance	02:39PM
8	between future-proofing and -- and verbosity, and -- and	02:39PM
9	the more you try to feature-proof, the more verbose you	02:39PM
10	can become, so it's more of a subjective column how you	02:39PM
11	design, keeping all of these in mind, yeah.	02:39PM
12	Q Thank you.	02:39PM
13	And after letter "d" on Exhibit 321, you say,	02:39PM
14	quote: It is more intuitive for first-time users, end	02:39PM
15	quote.	02:39PM
16	Do you see that?	02:39PM
17	A Yes.	02:39PM
18	Q What did you mean by that?	02:39PM
19	A This means that -- that user interface should	02:39PM
20	flow naturally in a sense that if I've never used	02:39PM
21	anything similar, I should be pretty much able to -- I	02:39PM
22	should be able to come in and type in a reasonable	02:39PM
23	keyword for things and get help on it and be able to	02:40PM
24	complete a configuration within a reasonable amount of	02:40PM
25	time rather than going through hours of research on it.	02:40PM

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1   Q   And that approach that you just described, did   02:40PM

2   you apply that approach for the commands that are listed   02:40PM

3   in Exhibit 316?   02:40PM

4   MR. CANNON: Objection; vague.   02:40PM

5   THE WITNESS: The -- what is 316? This is the   02:40PM

6   one -- okay. This -- it -- it certainly influenced our   02:40PM

7   structure for these commands. Yeah, so intuitiveness,   02:40PM

8   extensibility, usability, aesthetics are all factors   02:40PM

9   that we considered.   02:40PM

10   BY MR. WONG: 02:41PM

11   Q   Let's look at Exhibit 316 now, Mr. Patil.   02:41PM

12   A   Yeah.   02:41PM

13   Q   Starting with the first command, you were   02:41PM

14   associated with "clear lldp counters."   02:41PM

15   Do you see that?   02:41PM

16   A   Yes.   02:41PM

17   Q   What function does the "clear lldp counters"   02:41PM

18   command perform?   02:41PM

19   A   It's basically a reset, if you will, of all the   02:41PM

20   statistics that have been accumulated over a period of   02:41PM

21   time, and if you want to start off on a clean slate   02:41PM

22   again at a certain period of time on a -- on a certain   02:41PM

23   router or switch, then you could issue that command and   02:42PM

24   it will clear all the statistics.   02:42PM

25   Q   And how long did it take you, approximately, to   02:42PM

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1	come up with the syntax of "clear lldp counters"?	02:42PM
2	MR. CANNON: Objection; vague.	02:42PM
3	THE WITNESS: Oh, just that one command?	02:42PM
4	MR. WONG: Mm-hmm.	02:42PM
5	THE WITNESS: I don't know, 15 minutes.	02:42PM
6	BY MR. WONG:	02:42PM
7	Q Okay. How long did it take you, approximately,	02:42PM
8	to do the source code writing to implement the	02:42PM
9	functionality for the "clear lldp counters" command?	02:42PM
10	MR. CANNON: Objection; vague, assumes facts not	02:42PM
11	in evidence.	02:42PM
12	THE WITNESS: Okay. That would be, again,	02:42PM
13	15 minutes, and I have to add that this is a easiest one	02:42PM
14	to implement.	02:42PM
15	BY MR. WONG:	02:42PM
16	Q For the "clear lldp table" command --	02:42PM
17	A Mm-hmm.	02:42PM
18	Q -- what functionality does that perform?	02:43PM
19	A That is, again, a reset, but more at the enable	02:43PM
20	level in the sense that, let's say, a device comes up	02:43PM
21	and it discovers ten neighbors and we want to come in	02:43PM
22	and manually reset the table by making it forget all	02:43PM
23	those ten neighbors instantly, then we would use that	02:43PM
24	command.	02:43PM
25	Q And approximately how long did it take you to	02:43PM

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